

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KATHRYN HYLAND, MELISSA GARCIA,
ELIZABETH TAYLOR, JESSICA SAINT-
PAUL, REBECCA SPITLER-LAWSON,
MICHELLE MEANS, ELIZABETH
KAPLAN, JENNIFER GUTH, MEGAN
NOCERINO, and ANTHONY CHURCH
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

NAVIENT CORPORATION and NAVIENT
SOLUTIONS, LLC,

Defendants.

No. 18-cv-9031-DLC-BLM

**DECLARATION OF YELENA KONANOVA
IN SUPPORT OF PLAINTIFFS' CONSOLIDATED MEMORANDUM OF LAW IN
OPPOSITION TO OBJECTIONS TO THE SETTLEMENT AGREEMENT**

YELENA KONANOVA, an attorney duly admitted to practice law before this Court,
declares as follows:

1. I am a member of the law firm of Selendy & Gay, PLLC ("S&G" or "Lead Counsel"), who along with co-counsel, Mark Richard at Phillips, Richard & Rind, P.A. ("PR&R," and collectively with S&G, "Class Counsel"), are counsel for Plaintiffs Kathryn Hyland, Melissa Garcia, Elizabeth Taylor, Jessica Saint-Paul, Rebecca Spitler-Lawson, Michelle Means, Elizabeth Kaplan, Jennifer Guth, Megan Nocerino, and Anthony Church (collectively, "Plaintiffs" or "Class Representatives") and Class Counsel for the Settlement Class¹ in the class action proceeding captioned above. *See* Dkt. 108 (Preliminary Approval Order). I make this Declaration based on

¹ All terms not defined herein have the meaning ascribed to them in the Settlement Agreement.

my own personal knowledge, pursuant to 28 U.S.C. § 1746, and in support of Plaintiffs' Consolidated Memorandum of Law in Opposition to Objections to the Settlement Agreement.

OBJECTIONS AND OTHER COMMUNICATIONS RECEIVED

2. Following this Court's June 19, 2020 preliminary approval of the proposed settlement, setting a deadline of September 11, 2020 for any objections, Dkt. 108 ¶ 16, a total of 109 timely objections have been filed with the Court or submitted to the Settlement Administrator.

3. Additionally, three untimely objections postmarked after September 11, 2020 were submitted to the Settlement Administrator.

4. Finally, 19 other individuals submitted communications without objections to the Settlement Administrator or filed such communications with the Court.

5. As relevant to addressing one of the objections, Plaintiffs Church, Garcia, Guth, Kaplan, Means, and Spitler-Lawson have informed Class Counsel that each continues to have their federal student loans serviced by Navient.

6. Moreover, Navient has informed Class Counsel that less than half of the individuals who received class notice (based on the criteria set forth in the Settlement Agreement and ordered by the Court for class notice purposes) were individuals whose loans were transferred for servicing to FedLoan Servicing.

7. The following is a list in alphabetical order by last name of the objector of all objections and communications filed with the Court or submitted to the Settlement Administrator. All objections or communications not previously filed with this Court are attached as Exhibit 1 in a bookmarked PDF.

8. **James Alston** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on August 19, 2020 to the Settlement Administrator, is attached at page 1 of Exhibit 1 (part 1 of 4).

9. **Jessica Amoroso** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and provides only forward-looking non-monetary relief in the form of business practice enhancements that do not address past injuries. Ms. Amoroso requests to speak at the Final Approval Hearing. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 4 of Exhibit 1 (part 1 of 4).

10. **Melissa Anderson** submitted a letter describing her experiences with Navient and asking the Court to hold Navient accountable. The letter, which is dated September 9, 2020 but is post-marked after the objection deadline on September 12, 2020, was submitted to the Settlement Administrator and is attached at page 32 of Exhibit 1 (part 1 of 4).

11. **Colleen Ayers** objects to the settlement because of her view that it does not benefit former Navient customers or those who will complete repayment before becoming eligible for PSLF, and because in order to recover on related claims in the future, class members must bring individual actions rather than a class action. The objection, which was submitted on August 14, 2020 to the Settlement Administrator, is attached at page 35 of Exhibit 1 (part 1 of 4).

12. **Julie Marie Baldwin** objects to the settlement because of her view that she does not benefit from the settlement, and asks to be excluded from the settlement because she would like the option of participating in a different case at a later date. The objection, which was submitted on August 24, 2020 to the Settlement Administrator, is attached at page 39 of Exhibit 1 (part 1 of 4).

13. **Tanya Ball** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and requests to speak at the Final Approval Hearing. The objection, which was submitted on September 9, 2020 to the Settlement Administrator, is attached at page 41 of Exhibit 1 (part 1 of 4).

14. **Nedra Barnes-Larrieux** submitted a letter asking to speak at the Final Approval Hearing. The letter, which was submitted to the Settlement Administrator on September 11, 2020, is attached at page 44 of Exhibit 1 (part 1 of 4).

15. **Jason Brennan** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and the proposed non-monetary relief is, in his view, “worthless.” The objection, which was submitted to the Settlement Administrator, is attached at page 47 of Exhibit 1 (part 1 of 4).

16. **Lara Brinson** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 52 of Exhibit 1 (part 1 of 4).

17. **Thomas Brooks** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and the \$1.75 million *cy pres* contribution should instead be distributed to members of the Settlement Class. The objection, which was submitted on July 25, 2020 to the Settlement Administrator, is attached at page 56 of Exhibit 1 (part 1 of 4).

18. **Stephon Brown** objects to the settlement because the Service Award amounts are the same for each class representative regardless of outstanding student loan debt. The objection, which was submitted on August 3, 2020 to the Settlement Administrator, is attached at page 97 of Exhibit 1 (part 1 of 4).

19. **Monica Brown-Hall** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and because of her view that the \$1.75 million *cy pres* contribution should instead be distributed to members of the Settlement Class. Ms. Brown-Hall requests to speak at the Final Approval Hearing. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 147 of Exhibit 1 (part 1 of 4).

20. **Susan Burgess-Cox** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and provides only forward-looking non-monetary relief in the form of business practice enhancements that do not address past injuries. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 167 of Exhibit 1 (part 1 of 4).

21. **Aniko Campbell** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on August 4, 2020 to the Settlement Administrator, is attached at page 194 of Exhibit 1 (part 1 of 4).

22. **Richard Carson** objects to the settlement for the reasons described in his memorandum of law filed with the Court on September 11, 2020 at Dkt. 167 and requests that his attorney speak at the Final Approval Hearing.

23. **Leslie Celestine** objects to the settlement and describes her experience with Navient. The objection, which was submitted to the Settlement Administrator on September 14, 2020, is attached at page 196 of Exhibit 1 (part 1 of 4).

24. **Joan Christodoulou** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on August 6, 2020 to the Settlement Administrator, is attached at page 199 of Exhibit 1 (part 1 of 4).

25. **Victoria Ciucci-Walley** submitted a letter describing her experiences with Navient and PSLF, asking to be included in the class action, and offering to answer questions or participate in the final hearing if requested. The letter, which is dated September 5, 2020 but is post-marked after the objection deadline on September 12, 2020, was submitted to the Settlement Administrator and is attached at page 201 of Exhibit 1 (part 1 of 4).

26. **Gregory Clauss** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and requests to speak at the Final Approval Hearing. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 203 of Exhibit 1 (part 1 of 4).

27. **Elaine Cooper** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and provides only forward-looking non-monetary relief in the form of business practice enhancements that do not address past injuries. The objection, which was submitted on August 25, 2020 to the Settlement Administrator, is attached at page 207 of Exhibit 1 (part 1 of 4).

28. **Nicholas Daloia** objects to the settlement because it does not provide forgiveness for his student loans. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 209 of Exhibit 1 (part 1 of 4).

29. **Denise D'Andrea** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 22, 2020 to the Settlement Administrator, is attached at page 211 of Exhibit 1 (part 1 of 4).

30. **Logan David** objects to the settlement because of his view that the business practice enhancements and Public Service Promise will provide services that Navient should have been providing to borrowers already, and because the *cy pres* award is going to Public Service Promise

rather than borrowers. The objection, which was submitted on July 29, 2020 to the Settlement Administrator, is attached at page 214 of Exhibit 1 (part 1 of 4).

31. **Amari Dawson** objects to the settlement because it does not include forgiveness of Settlement Class members' student loans. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 216 of Exhibit 1 (part 1 of 4).

32. **Clearisa Donalson** submitted a letter describing her experiences with Navient and PSLF and the impact of her student loans on her life. The letter was filed with the Court on September 9, 2020 at Dkt. 152.

33. **Uma Dorn** objects to the settlement because the settlement does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 12, 2020, is attached at page 225 of Exhibit 1 (part 1 of 4).

34. **Samantha Dorsch** objects to the settlement because it does not provide monetary relief to members of the Settlement Class, and asks to be excluded from the settlement in order to take further legal action independently or with others if the settlement is not modified to provide additional relief to members of the Settlement Class. The objection, which was submitted on August 11, 2020 to the Settlement Administrator, is attached at page 227 of Exhibit 1 (part 2 of 4).

35. **Connolly Dsouza** submitted a letter asking to speak at the Final Approval Hearing. The letter, which was submitted to the Settlement Administrator on September 1, 2020, is attached at page 230 of Exhibit 1 (part 2 of 4).

36. **Tanya Earp** submitted a letter asking to be excluded from the Settlement Class because she would like to pursue legal action against Navient in the future. The letter, which was submitted to the Settlement Administrator on July 27, 2020, is attached at page 232 of Exhibit 1 (part 2 of 4).

37. **Betty Edwards** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on July 28, 2020 at Dkt. 155.

38. **Theresa Fiorito** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 16, 2020 to the Settlement Administrator, is attached at page 234 of Exhibit 1 (part 2 of 4).

39. **Sara Fischer** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on August 6, 2020 to the Settlement Administrator, is attached at page 236 of Exhibit 1 (part 2 of 4).

40. **April Franklin** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 238 of Exhibit 1 (part 2 of 4).

41. **Stephen Frisby** objects to the settlement because it does not address his concerns with Navient's accounting practices and administrative errors causing miscounting of payments, and because of his view that it could impair his ability to recover damages in the future if his qualifying payments are not fully counted. The objection, which is dated September 11, 2020 but is post-marked after the objection deadline on September 12, 2020, was submitted to the Settlement Administrator and is attached at page 240 of Exhibit 1 (part 2 of 4).

42. **Grace Galba-Bright** objects to the settlement because the settlement does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 31, 2020 to the Settlement Administrator, is attached at page 242 of Exhibit 1 (part 2 of 4).

43. **Felecia Gardner** objects to the settlement because of her view that the settlement is not fair or adequate. The objection was filed with the Court on September 9, 2020 at Dkt. 150.

44. **Kimberly Gardner** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on September 8, 2020 at Dkt. 141.

45. **Sherri Gholston** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and because of her view that individuals should be able to opt out of the settlement. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 245 of Exhibit 1 (part 2 of 4).

46. **Arthur Gilbert** objects to the settlement because it does not include forgiveness for his student loans. The objection, which was submitted on August 31, 2020 to the Settlement Administrator, is attached at page 248 of Exhibit 1 (part 2 of 4).

47. **Jane Hanson** objects to the settlement because of her view that Navient incorrectly told her that her loan would be forgiven under PSLF and requests to speak at the Final Approval Hearing. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 254 of Exhibit 1 (part 2 of 4).

48. **Rebecca Harper** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 288 of Exhibit 1 (part 2 of 4).

49. **Jacqueline Harris** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and requests to speak at the Final Approval Hearing. The objection was filed with the Court on September 8, 2020 at Dkt. 144.

50. **Lynn Hash** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and because of her view that the Court should investigate each

case individually. The objection, which was submitted on August 31, 2020 to the Settlement Administrator, is attached at page 298 of Exhibit 1 (part 2 of 4).

51. **Pinky Hayes** objects to the settlement because it does not include loan forgiveness for teachers and government employees. The objection, which was submitted on August 31, 2020 to the Settlement Administrator, is attached at page 301 of Exhibit 1 (part 2 of 4).

52. **Holly Lyn Herdman** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on August 13, 2020 to the Settlement Administrator, is attached at page 303 of Exhibit 1 (part 2 of 4).

53. **Diane Heribacka** submitted a letter describing her experiences with Navient and what Navient representatives told her about PSLF. The letter, which was submitted to the Settlement Administrator on September 8, 2020, is attached at page 307 of Exhibit 1 (part 2 of 4).

54. **Emporia Hollingsworth** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and her view that the business practice enhancements should have been in place all along. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 309 of Exhibit 1 (part 2 of 4).

55. **Karla Hontz** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 27, 2020 to the Settlement Administrator, is attached at page 313 of Exhibit 1 (part 2 of 4).

56. **Ashley Hopkins** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 2, 2020 to the Settlement Administrator, is attached at page 316 of Exhibit 1 (part 2 of 4).

57. **Karrie Horn** submitted a letter describing her experiences with Navient and her efforts to get PSLF. The letter, which was submitted to the Settlement Administrator on September 9, 2020, is attached at page 322 of Exhibit 1 (part 2 of 4).

58. **Kenyatta Hudson** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 324 of Exhibit 1 (part 2 of 4).

59. **Velma Hypolite** objects to the settlement because of the incorrect information she received from Navient regarding loan forgiveness. The objection, which was submitted on September 10, 2020 to the Settlement Administrator, is attached at page 327 of Exhibit 1 (part 2 of 4).

60. **Tabitha Jablonski** objects to the settlement because of her view that the settlement does not provide a remedy for Settlement Class members who lost payments that should have counted towards PSLF. The objection, which was submitted on September 9, 2020 to the Settlement Administrator, is attached at page 330 of Exhibit 1 (part 2 of 4).

61. **Jerri Jacobs** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 21, 2020 to the Settlement Administrator, is attached at page 334 of Exhibit 1 (part 2 of 4).

62. **Christina Johansen** objects to the settlement because it does not provide monetary relief to the Settlement Class members and prevents Settlement Class members from participating in future class actions, and because of her view that it does not provide sufficient business practice enhancements. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 338 of Exhibit 1 (part 2 of 4).

63. **Beonka Johnson** submitted a letter asking to speak at the Final Approval Hearing. The letter, which was submitted to the Settlement Administrator on July 16, 2020, is attached at page 371 of Exhibit 1 (part 2 of 4).

64. **Rosie Jones** objects to the settlement because of her view that the Court should not have dismissed Plaintiffs' claims and requests to speak at the Final Approval Hearing. The objection, which was submitted to the Settlement Administrator, is attached at page 373 of Exhibit 1 (part 2 of 4).

65. **Gloria Jones-Dinkins** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 4, 2020 to the Settlement Administrator, is attached at page 375 of Exhibit 1 (part 2 of 4).

66. **Mary King** objects to the settlement because of her view that it does not address administrative errors made by Navient that affect PSLF eligibility and because it does not provide monetary relief for class members. The objection, which was submitted on July 19, 2020 to the Settlement Administrator, is attached at page 386 of Exhibit 1 (part 2 of 4).

67. **Houston Kirkaldie** submitted a letter requesting a claim form. The letter was filed with the Court on August 31, 2020 at Dkt. 138.

68. **Albert Knapp** objects to the settlement because it does not provide monetary relief for class members. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 388 of Exhibit 1 (part 2 of 4).

69. **Leslieanne Korte** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on September 9, 2020, at Dkt. 151.

70. **Linda Kreutzer** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 10, 2020 to the Settlement Administrator, is attached at page 390 of Exhibit 1 (part 2 of 4).

71. **Maries Laurel** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and does not give class members PSLF credit for previous payments. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 394 of Exhibit 1 (part 3 of 4).

72. **Elizabeth Lazzaro** objects to the settlement because it does not provide monetary relief or loan forgiveness to members of the Settlement Class. The objection, which was submitted on August 21, 2020 to the Settlement Administrator, is attached at page 403 of Exhibit 1 (part 3 of 4).

73. **Michelle Lenihan** submitted a letter asking to opt out of the settlement. The letter, which was submitted to the Settlement Administrator on September 7, 2020, is attached at page 405 of Exhibit 1 (part 3 of 4).

74. **Michael Lombardo** objects to the settlement because it does not provide monetary relief or loan forgiveness to members of the Settlement Class and requests to speak at the Final Approval Hearing. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 407 of Exhibit 1 (part 3 of 4).

75. **Dawn Longenecker** submitted a letter notifying the Court of her wish to be removed from the settlement in order to have the right to sue Navient for monetary relief in the future. The letter was filed with the Court on September 9, 2020 at Dkt. 157.

76. **Lois Lopez** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 15, 2020 to the Settlement Administrator, is attached at page 496 of Exhibit 1 (part 3 of 4).

77. **Julie Marshall** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 497 of Exhibit 1 (part 3 of 4).

78. **James Martin** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 10, 2020 to the Settlement Administrator, is attached at page 499 of Exhibit 1 (part 3 of 4).

79. **Codie Mayhew** objects to the settlement because of her view that the settlement does not hold Navient accountable for financial hardships and emotional distress suffered by class members. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 502 of Exhibit 1 (part 3 of 4).

80. **Delores McCoy** submitted a letter asking to opt out of the settlement. The letter, which was submitted to the Settlement Administrator on August 24, 2020, is attached at page 506 of Exhibit 1 (part 3 of 4).

81. **Renee McKinney** submitted a letter describing her experience asking Navient about PSLF. The letter, which was submitted to the Settlement Administrator on September 10, 2020, is attached at page 510 of Exhibit 1 (part 3 of 4).

82. **Erica McKnight** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 15, 2020 to the Settlement Administrator, is attached at page 512 of Exhibit 1 (part 3 of 4).

83. **Valerie Meade** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and because only class representatives will receive service awards. The objection, which was submitted on August 20, 2020 to the Settlement Administrator and to the Pennsylvania Attorney General's office, is attached at page 515 of Exhibit 1 (part 3 of 4).

84. **John Merine** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and does not include forgiveness of his loans. The objection, which was submitted on July 20, 2020 to the Settlement Administrator, is attached at page 528 of Exhibit 1 (part 3 of 4).

85. **Melisa Merine** objects to the settlement because it does not provide monetary relief for members of the Settlement Class, and asks to be excluded from the settlement unless it includes repayment of her loans. The objection, which was submitted on July 26, 2020 to the Settlement Administrator, is attached at page 533 of Exhibit 1 (part 3 of 4).

86. **Joelle Milliken** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on July 23, 2020 at Dkt. 112.

87. **Russell Moore** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 27, 2020 to the Settlement Administrator, is attached at page 538 of Exhibit 1 (part 3 of 4).

88. **Sean Multrine** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 27, 2020 to the Settlement Administrator, is attached at page 539 of Exhibit 1 (part 3 of 4).

89. **David Murad** objects to the settlement because it does not provide monetary relief to members of the Settlement Class, and because of his views that it does not penalize Navient and that the business practice enhancements should have already been part of Navient's business. The objection was filed with the Court on July 20, 2020 at Dkt. 153.

90. **Katie Newborn** objects to the settlement because it does not provide for forgiveness of Settlement Class members' loans. The objection, which was submitted on September 8, 2020 to the Settlement Administrator, is attached at page 542 of Exhibit 1 (part 3 of 4).

91. **The Nguyen** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and does not impose criminal penalties on Navient. The objection, which was submitted on July 13, 2020 to the Settlement Administrator, is attached at page 544 of Exhibit 1 (part 3 of 4).

92. **Sean O'Connor** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 6, 2020 to the Settlement Administrator, is attached at page 546 of Exhibit 1 (part 3 of 4).

93. **Pamela Phillips** objects to the settlement because it does not provide monetary relief to members of the Settlement Class, because it limits class members' rights to sue Navient, and because of her view that the duration of the business practice enhancements called for by the settlement is not long enough. The objection, which was submitted on September 9, 2020 to the Settlement Administrator, is attached at page 549 of Exhibit 1 (part 3 of 4).

94. **Alison Pierce** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on August 19, 2020 to the Settlement Administrator, is attached at page 561 of Exhibit 1 (part 3 of 4).

95. **Nicole Pitman** objects to the settlement because the settlement affects her rights and requests to speak at the Final Approval Hearing. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 563 of Exhibit 1 (part 3 of 4).

96. **Kemati Porter** objects to the settlement because it does not provide monetary relief to members of the Settlement Class, and because of her view that it does not hold Navient accountable for wrongdoing. The objection, which was submitted on September 10, 2020 to the Settlement Administrator, is attached at page 565 of Exhibit 1 (part 3 of 4).

97. **Michele Pulley** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on September 17, 2020 at Dkt. 171.

98. **Usha Rajan** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 26, 2020 to the Settlement Administrator, is attached at page 567 of Exhibit 1 (part 3 of 4).

99. **Laura Randolph-Kennedy** objects to the settlement because it does not provide monetary relief to the Settlement Class. The objection was filed with the Court on September 9, 2020 at Dkt. 154.

100. **Kimberly Riley** submitted a letter describing her experiences with Navient and being denied PSLF. The letter, which was submitted to the Settlement Administrator on September 3, 2020, is attached at page 569 of Exhibit 1 (part 3 of 4).

101. **Wilhelmina Robertson** objects to the settlement and requests a \$15,000 service award. The objection, which was submitted on July 13, 2020 to the Settlement Administrator, is attached at page 571 of Exhibit 1 (part 3 of 4).

102. **Jeronda Robinson** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 572 of Exhibit 1 (part 3 of 4).

103. **Martine Robinson** objects to the settlement because it does not provide monetary relief to members of the Settlement Class or provide for her past payments to count toward the PSLF program's required payments. The objection, which was submitted on September 9, 2020 to the Settlement Administrator, is attached at page 574 of Exhibit 1 (part 3 of 4).

104. **Christina Rogers** objects to the settlement because she considers it to be defective and requests to speak at the Final Approval Hearing. The objection was filed with the Court on September 10, 2020 at Dkt. 173.

105. **Sharon Ross** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on August 21, 2020 to the Settlement Administrator, is attached at page 577 of Exhibit 1 (part 4 of 4).

106. **Yael Routtenberg** objects to the settlement because of her view that it does not provide sufficient compensation for members of the Settlement Class or count their payments towards PSLF. The objection, which was submitted on September 7, 2020 to the Settlement Administrator, is attached at page 579 of Exhibit 1 (part 4 of 4).

107. **Amy Rubino** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 7, 2020 to the Settlement Administrator, is attached at page 589 of Exhibit 1 (part 4 of 4).

108. **Erin Rutherford** objects to the settlement because it does not provide monetary relief to members of the Settlement Class or to the nonprofit organizations who employ them. The

objection, which was submitted on August 23, 2020 to the Settlement Administrator, is attached at page 591 of Exhibit 1 (part 4 of 4).

109. **Jameelah Saleem** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on September 8, 2020 at Dkt. 147.

110. **Semantha Santangelo** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and requests to speak at the Final Approval Hearing. The objection was filed with the Court on August 25, 2020 at Dkt. 114.

111. **Daniel Schlegel** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and does not allow them to count all years they worked for a public service employer toward PSLF. The objection, which was submitted on September 3, 2020 to the Settlement Administrator, is attached at page 594 of Exhibit 1 (part 4 of 4).

112. **Mary Ann Schuoler** objects to the settlement because of her view that Navient lied to her about PSLF. The objection, which was submitted on September 4, 2020 to the Settlement Administrator, is attached at page 599 of Exhibit 1 (part 4 of 4).

113. **Lorrie Scrivner** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 24, 2020 to the Settlement Administrator, is attached at page 603 of Exhibit 1 (part 4 of 4).

114. **Joseph Shankles** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 4, 2020 to the Settlement Administrator, is attached at page 605 of Exhibit 1 (part 4 of 4).

115. **Theresa Skewes-Gomez** objects to the settlement because of her view that the *cy pres* award will not help Settlement Class members like her who have already missed out on PSLF.

The objection, which was submitted on August 11, 2020 to the Settlement Administrator, is attached at page 607 of Exhibit 1 (part 4 of 4).

116. **Christy Jane Slaven** submitted a letter asking to opt out of the settlement to pursue legal action against Navient in the future. The letter, which was submitted to the Settlement Administrator on September 3, 2020, is attached at page 616 of Exhibit 1 (part 4 of 4).

117. **Larina Steinke** objects to the settlement because of her view that the settlement does not help class members. The objection, which was submitted on September 10, 2020 to the Settlement Administrator, is attached at page 634 of Exhibit 1 (part 4 of 4).

118. **Melanie Stevick** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on September 8, 2020 at Dkt. 143.

119. **Joy Sutton** objects to the settlement because it does not include forgiveness for her student loans. The objection, which was submitted on September 1, 2020 to the Settlement Administrator, is attached at page 636 of Exhibit 1 (part 4 of 4).

120. **Sharlene Sylvester** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on September 8, 2020 at Dkt. 146.

121. **Janet Thai** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection was filed with the Court on September 8, 2020 at Dkt. 172.

122. **Nakithia Thomas** objects to the settlement because it does not provide monetary relief to members of the Settlement Class or forgiveness of her loans. The objection, which was

submitted on July 29, 2020 to the Settlement Administrator, is attached at page 638 of Exhibit 1 (part 4 of 4).

123. **Robert Till** objects to the settlement because the Cy Pres award does not help the Settlement Class members who have already lost payments and the settlement does not include an enforcement mechanism. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 640 of Exhibit 1 (part 4 of 4).

124. **Laura Tracey** objects to the settlement because of her view that the settlement does not provide sufficient relief to the Settlement Class. The objection was filed with the Court on September 9, 2020 at Dkt. 149.

125. **Theresa Jean Lane Van Nocker** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and requests to speak at the Final Approval Hearing. The objection, which was submitted on September 11, 2020 to the Settlement Administrator, is attached at page 646 of Exhibit 1 (part 4 of 4).

126. **Lisa Vorrasi** objects to the settlement because it does not provide monetary relief to members of the Settlement Class, and because of her view that it does not provide relief for borrowers who have already repaid their loans in full. The objection, which was submitted on September 9, 2020 to the Settlement Administrator, is attached at page 650 of Exhibit 1 (part 4 of 4).

127. **Debra Walker-Brown** submitted a letter requesting to speak at the Final Approval Hearing regarding the fairness of the settlement and her right to PSLF. The letter was filed with the Court on September 8, 2020 at Dkt. 145.

128. **Elizabeth Walsh** objects to the settlement because it does not provide her with PSLF credit for all of her student loan payments made while working for a qualifying employer.

The objection, which was submitted on July 17, 2020 to the Settlement Administrator, is attached at page 655 of Exhibit 1 (part 4 of 4).

129. **Jamie Warren** objects to the settlement because he believes the lawsuit should go forward. The objection was filed with the Court on July 14, 2020 at Dkt. 148.

130. **Wayne Werner** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 2, 2020 to the Settlement Administrator, is attached at page 663 of Exhibit 1 (part 4 of 4).

131. **Allen West** objects to the settlement because of his views that the cost of the settlement to Navient is too low, this case did not address additional wrongdoing by Navient, and the Settlement Class does not benefit from the settlement. The objection, which was submitted on August 14, 2020 to the Settlement Administrator, is attached at page 718 of Exhibit 1 (part 4 of 4).

132. **Cheryl Williams** objects to the settlement because the settlement does not include loan forgiveness for members of the Settlement Class. The objection, which was submitted on August 24, 2020 to the Settlement Administrator, is attached at page 721 of Exhibit 1 (part 4 of 4). Ms. Williams requests that her objection be read aloud during the Final Approval Hearing.

133. **Keith Williams** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on July 13, 2020 to the Settlement Administrator, is attached at page 727 of Exhibit 1 (part 4 of 4).

134. **Kenneth Williams** objects to the settlement because it does not provide monetary relief to members of the Settlement Class and requests to speak at the Final Approval Hearing. The objection was filed with the Court on September 8, 2020 at Dkt. 142.

135. **Shemeica Williams** objects to the settlement because it does not provide monetary relief to members of the Settlement Class. The objection, which was submitted on September 9, 2020 to the Settlement Administrator, is attached at page 728 of Exhibit 1 (part 4 of 4).

136. **Maurishia Wilson** submitted a letter asking to speak at the Final Approval Hearing. The letter, which was submitted to the Settlement Administrator on July 15, 2020, is attached at page 736 of Exhibit 1 (part 4 of 4).

137. **Racheal Wilson** submitted a letter asking to speak at the Final Approval Hearing. The letter, which was submitted to the Settlement Administrator on July 16, 2020, is attached at page 738 of Exhibit 1 (part 4 of 4).

138. **William Yeatman** objects to the settlement for the reasons described in his memorandum of law filed with the Court on September 11, 2020 at Dkt. 161 and requests that his attorney speak at the Final Approval Hearing.

The undersigned declares under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
September 25, 2020

/s/ Yelena Konanova
Yelena Konanova